

**Commonwealth of Kentucky  
Division for Air Quality**

***RESPONSE TO COMMENTS***

ON THE TITLE V/PSD OPERATING DRAFT PERMIT V-03-024

CTNA Manufacturing LLP

One General Street

Mayfield, Kentucky 42066

January 12, 2004

Ralph Gosney, Reviewer

Plant I.D. #: 21-083-00006

Application Log #: 51193

**SOURCE DESCRIPTION:**

An operating permit application was received from CTNA Manufacturing LLP on December 14, 1999 and was called complete on February 11, 2000. The applicant proposes to operate six (6) natural gas-fired indirect heat exchangers. These heat exchangers consist of (3)-37.5 mmBtu/hr units, a 75 mmBtu/hr unit, a 112.50 mmBtu/hr unit, and a 150 mmBtu/hr unit. In addition, source will operate several paint spray booths and tire manufacturing operations. The tire manufacturing operations have a maximum operating rate of 48,735 lbs/hr of finished rubber product.

**PUBLIC AND U.S. EPA REVIEW:**

On November 05, 2003, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Kentucky Messenger* in Mayfield, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from CTNA Manufacturing LLP on December 4, 2003. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

# ATTACHMENT A

## Response to Comments

Comments on CTNA Manufacturing LLP Draft Title V Air Quality Permit submitted by Kyle Flora, Environmental/Energy Engineer.

Comment

1. On page 2, emission units 35-36, 38 - These are old emission unit numbers for the Final Finish department. These somehow mistakenly made their way back into the draft. All of the limitations associated with these unit numbers are thus also invalid. The actual emission units should be **03, 07-12**. Reference page 2 from the previous draft you emailed me dated 6/30/03 for the limitations.

Response

*The Division concurs with the comment and has revised the permit as suggested.*

Comment:

2. On page 4, emission units 53-56, 58 & 96 -Emission unit **57** has been omitted. Also, under the description for control device, per our telephone discussion, please list that the baghouse is in place, but not used regularly on unit 58. Also, in this regard, please adjust wording in 4.a., 5.b. and 7 to reflect this.

Response:

*The Division concurs with the comment and has revised the permit as suggested. A conditional phrase "when being used" has been added to the wording in 4.b, 5.b. and 7a. These address specifically the alternate usage of the exhaust fan or the baghouse dust collector for emission unit 58.*

Comment:

3. On page 6, emission units 21, 86, & 91 -Emission unit 21 does not exist anymore. Emission units should be **02 and 06**, not 21.

Response:

*The Division concurs with the comment and has revised the permit as suggested.*

Comment:

4. On page 8, emission units 87, 50, 92-95, & 97 -Under the description, there are only baghouse control devices on units **87, 92 and 50**. None on units 93-95 and 97.

Response:

*The Division concurs with the comment and has revised the permit as suggested.*

Comment:

5. On page 10, emission unit 59 - Under the description, please add that the unit was modified in 2003. Also, per your request, I found the letter from the KYDEP in regards to the amended maximum process rate. The letter dated February 12, 1987 to Mr. Bill G. Haywood provides a new maximum process rate of 32,000 tons per year. Let me know if you do not have this in your files and I can forward you a copy

Response:

*The Division concurs with the comment and has revised the permit as suggested. Please see Attachment B for the supporting document.*

Comment:

6. On page 12, emission unit 79 -There is no baghouse dust collector on this unit.

Response

*The Division concurs with the comment and has revised the permit as suggested.*

Comment:

7. On page 38, emission unit 69 -This is one of the units that was removed summer 2003 that Bill Clark verified.

Response

*The Division concurs with the comment and has revised the permit as suggested. Please see Attachment B for the supporting document.*

**Addition:**

*Based on phone conversations with Mr. Kyle Flora and the Division for Air Quality, Field Office Supervisor- Mr. Bill Clark on December 04, 2003 and December 10, 2003, in reference to the installation of pressure drop gauges for the baghouses; the Division has added a condition to the permit to address the concern of the permittee.*

**SECTION G - GENERAL PROVISIONS- page 45 of 49 of the permit**

17. Pressure drop gauges on all baghouses shall be installed 180 days upon the issuance of this permit, to address the recordkeeping and monitoring requirements.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

## **ATTACHMENT B**

*Copy of letter addressing amendment to the processing rate & the certification of removal for  
Emission Unit 69 for the Division for Air Quality Field Office Supervisor-Bill Clark*